

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

CHARLIE JAVICE and OLIVIER AMAR,

Defendants.

Case No.: 1:23-cr-00251-AKH

**DEFENDANT CHARLIE JAVICE'S NOTICE OF MOTIONS IN LIMINE  
AND MEMORANDA OF LAW IN SUPPORT**

Pursuant to the Court's Order Regulating Proceedings [ECF No. 163], Defendant Charlie Javice hereby makes the following *in limine* motions<sup>1</sup>:

1. Evidence and argument comparing Ms. Javice to well-known, convicted fraudsters should be excluded;
2. The government's exhibits with no path to admissibility should be excluded pretrial;
3. Evidence related to [REDACTED] Declined Investment in Frank should be excluded;
4. The Court should enter sequestration and nondisclosure orders covering non-party witnesses and their representatives pursuant to Federal Rule of Evidence 615;
5. The Court should not allow the government to call [REDACTED] to testify.

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<sup>1</sup> To facilitate the Court's resolution of these matters, Ms. Javice will cause to be delivered to Chambers a copy of each exhibit referenced herein, labeled by exhibit number. Voluminous and media exhibits can be made available upon request of the Court.

Respectfully submitted,

DATED: January 13, 2024

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& SULLIVAN, LLP**

By: /s/ Sara Clark

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 13, 2025, I caused a copy of the foregoing document to be served via ECF on counsel of record.

By: /s/ Sara C. Clark